

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

WANNETTA PREMUSCA	)	
	)	
Plaintiff,	)	Civil Action File No.
	)	
vs.	)	
	)	
DKC TRANSPORTATION, LLC,	)	State Court of Bibb County
TONY ROBBINS, JOHN DOE and	)	Civil Action File No.
JOHN DOE LLC,	)	21-sccv0-03546
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

COMES NOW, Defendants DKC TRANSPORTATION and TONY ROBBINS, (sometimes collectively “Defendants”), and pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, file this Notice of Removal, showing the Court as follows:

1.

Plaintiff Wannetta Premusca (“Plaintiff”) filed suit against Defendants in the State Court of Bibb County, Civil Action File No.: 21-SCCV-093546 (“State Action”) on November 10, 2021. Bibb County is within the Macon Division of this Court. See, 28 U.S.C. § 90(a)(2).

2.

Tony Robbins was served with process on November 24, 2021.

3.

DKC Transportation, LLC has not yet been served.

4.

Defendants attach hereto as Exhibit “A”, copies of the summons and complaint in the State Action.

5.

Based on reasonable belief, Plaintiff is a citizen of Georgia.

6.

At the time Plaintiff filed the State Action, Tony Robbins resided, and continues to reside in Greeneville Tennessee.

7.

At the time Plaintiff filed the State Action, DKC Transportation was incorporated in the State of Florida, and maintains its principal place of business at Dover, Florida.

8.

Defendants provided written notice of this Notice of Removal to plaintiff by notifying his counsel of record, Paul R. Ayerbe, Ayerbe & Arnold, LLC 3608 Vineville Avenue Post Office Box 6073 Macon Georgia 31208, by filing a notice of

removal with the Clerk of the State Court of Bibb County, a copy of which is attached hereto as Exhibit “B”.

9.

Defendants have not yet filed Answers in this case either because they have not yet been served or an Answer is not yet due.

10.

Defendants show that the amount in controversy requirement of 28 U.S.C. § 1332(a) is met in this case. Plaintiff’s claims are for personal injuries arising out of a motor vehicle collision.

11.

To the best of the undersigned’s knowledge, information, and belief, and after reasonable inquiry, this Notice of Removal is well-grounded in fact and is warranted by existing law, and has not been interposed for any improper purpose, such as to harass, cause unnecessary delay, or a needless increase in the cost of litigation.

WHEREFORE Defendants pray the case be removed to the United States District Court for the Middle District of Georgia, Macon Division.

This 4<sup>th</sup> day of January, 2022.

*(Signature on following page)*

191 Peachtree Street NE  
Suite 3600  
Atlanta, Georgia 30303  
Phone: 404-215-2443  
Phone: 404-522-8220  
Fax: 404-523-2345  
[sjcohen@cskl.law](mailto:sjcohen@cskl.law)  
[abeaton@cskl.law](mailto:abeaton@cskl.law)

Respectfully submitted,

COPELAND, STAIR, KINGMA &  
LOVELL, LLP

/s/ Anna K. Beaton

---

STEPHEN J. COHEN  
State Bar No.: 556599  
Anna K. Beaton  
State Bar No.: 421320

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the within and foregoing pleading upon all parties to this matter via the Court's electronic filing system, which will automatically e-mail a copy to counsel of record addressed as follows:

Paul R. Ayerbe  
William T. Arnold  
AYERBE & ARNOLD, LLC  
3608 Vineville Avenue  
Post Office Box 6073  
Macon, Georgia 31208  
*Counsel for Plaintiff*

This 4<sup>th</sup> day of January, 2022.

Respectfully submitted,

191 Peachtree Street NE  
Suite 3600  
Atlanta, Georgia 30303  
Phone: 404-215-2443  
Phone: 404-522-8220  
Fax: 404-523-2345  
[sjcohen@cskl.law](mailto:sjcohen@cskl.law)  
[abeaton@cskl.law](mailto:abeaton@cskl.law)

COPELAND, STAIR, KINGMA &  
LOVELL, LLP

/s/ Anna K. Beaton

ANNA K. BEATON

State Bar No.: 41320

*Counsel for Defendants*